

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 4:21-cr-00539-RWS-JMB
)	
MICHAEL J. MCCORMAC,)	
)	
Defendant.)	

**MOTION FOR ADDITIONAL TIME TO OBTAIN AND REVIEW DISCOVERY
MATERIALS AND DETERMINE WHETHER, AND/OR WHICH, PRETRIAL
MOTIONS ARE TO BE FILED**

COMES NOW defendant Michael J. McCormac, by and through undersigned counsel, and hereby respectfully requests from this Honorable Court an additional sixty days to review discovery and determine whether, and/or which, pretrial motions ought to be filed on behalf of defendant. In support thereof, defendant states as follows:

1. Defendant was arraigned on the Indictment in the above-referenced matter on October 18, 2021.
2. Counsel for defendant entered his appearance for defendant on November 29, 2021.
3. Counsel for defendant received discovery in this matter on December 2, 2022.
4. The discovery received to date is quite voluminous, including approximately 41,000 pages of reports, interviews, and documents seized during the search warrant in this case. In addition, the discovery contains approximately 10,000 recorded telephone calls, of which approximately 5,000 are of some substance to the charges set forth in the Indictment.

5. Counsel for defendant has personally met with the Government, as well as had numerous other discussions, regarding the voluminous discovery referenced above. As a result, counsel for defendant must perform additional investigation and continue reviewing with defendant the voluminous discovery referenced above in order to allow time for the defendant to consider his options.

6. Further, to deny defendant's request for such additional time would deny counsel for defendant the reasonable time necessary to effectively investigate and prepare pretrial motions, taking into account the exercise of due diligence. Therefore, the ends of justice are served by granting defendant's request.

7. Assistant United States Attorney Meredith Reiter has no objection to defendant's request for additional time to review discovery and determine whether, and/or which, pretrial motions ought to be filed on behalf of defendant.

WHEREFORE, defendant Michael J. McCormac, by and through counsel, respectfully requests this Court grant an extension of the deadline until and including May 24, 2022, to file any pretrial motions or a waiver thereof.

Dated: March 28, 2022

Respectfully submitted,

/s/ John T Davis

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Attorney for Defendant Michael J. McCormac

CERTIFICATE OF SERVICE

I hereby certify on the 28th day of March, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Assistant United States Attorney.

/s/ John T Davis

John T Davis